

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

DAVITA M. KEY, )  
                        )  
Plaintiff,         )  
                        )  
v.                     ) Case No. 2:19-CV-767-ECM  
                        )  
HYUNDAI MOTOR MANUFACTURING, )  
ALABAMA, LLC; HYUNDAI ENG     )  
AMERICA, INC.; and DYNAMIC    )  
SECURITY, INC.         )  
                        )  
Defendants.         )

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**EXHIBIT H TO**

**PLAINTIFF'S OBJECTIONS TO HYUNDAI MOTOR MANUFACTURING,  
ALABAMA, LLC'S DEPOSITION DESIGNATIONS**

**DAVITA KEY, PLAINTIFF**

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| Case       | Key, Davita      |
| Issue Code | HMMA Designation |

| KEY, DAVITA 6/20/22 VOL 1 |                 |  |
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| 1                         | 001:01 - 001:25 | <p>001:01 IN THE UNITED STATES DISTRICT COURT</p> <p>02 FOR THE MIDDLE DISTRICT OF ALABAMA</p> <p>03 NORTHERN DIVISION</p> <p>04</p> <p>05 CASE NUMBER: 2:19-CV-767-ECM</p> <p>06</p> <p>07 DAVITA M. KEY,</p> <p>08 Plaintiff,</p> <p>09 v.</p> <p>10 HYUNDAI MOTOR MANUFACTURING, ALABAMA, LLC;</p> <p>11 HYUNDAI ENG, AMERICA, INC.; and DYNAMIC</p> <p>12 SECURITY, INC.,</p> <p>13 Defendants.</p> <p>14</p> <p>15 DEPOSITION OF</p> <p>16 DAVITA M. KEY</p> <p>17 June 20, 2022</p> <p>18 9:27 a.m.</p> <p>19</p> <p>20 The deposition of DAVITA M. KEY was</p> <p>21 taken before Sabrina Lewis, CCR, RDR, CRR, on</p> <p>22 June 20, 2022, by the defendants, commencing at</p> <p>23 approximately 9:27 a.m., at Hyundai Motor</p> <p>24 Manufacturing, Montgomery, Alabama, pursuant to</p> <p>25 the stipulations set forth herein.</p> |
| 2                         | 004:01 - 005:25 | <p>004:01 A P P E A R A N C E S</p> <p>02</p> <p>03 APPEARING ON BEHALF OF THE PLAINTIFF:</p> <p>04 Leslie Ann Palmer, Esq.</p> <p>05 Palmer Law, LLC</p> <p>06 104 23rd Street South, Suite 100</p> <p>07 Birmingham, Alabama 35233</p> <p>08 205-285-3050</p> <p>09 leslie@palmerlegalservices.com</p> <p>10</p> <p>11 Heather Newsom Leonard, Esq.</p> <p>12 Heather Leonard P.C.</p>   |

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|   |                 | <p>13 2105 Devereux Circle, Suite 111<br/>     14 Birmingham, Alabama 35243<br/>     15 205-977-5421<br/>     16 heather@heatherleonardpc.com<br/>     17<br/>     18 APPEARING ON BEHALF OF THE DEFENDANT, HYUNDAI<br/>     19 MOTOR MANUFACTURING ALABAMA, LLC:<br/>     20 David J. Middlebrooks, Esq.<br/>     21 Lehr Middlebrooks Vreeland &amp; Thompson, P.C.<br/>     22 P.O. Box 11945<br/>     23 Birmingham, Alabama 35202-1945<br/>     24 205-326-3002<br/>     25 dmiddlebrooks@lehrmiddlebrooks.com</p> <p>005:01 A P P E A R A N C E S (continued)</p> <p>02<br/>     03 APPEARING ON BEHALF OF THE DEFENDANT,<br/>     04 HYUNDAI ENG, AMERICA, INC.:<br/>     05 T. Matthew Miller, Esq.<br/>     06 Bradley Arant Boult Cummings LLP<br/>     07 One Federal Place<br/>     08 1819 Fifth Avenue North<br/>     09 Birmingham, Alabama 35203-2119<br/>     10 205-521-8000<br/>     11 mmiller@bradley.com<br/>     12<br/>     13 APPEARING ON BEHALF OF THE DEFENDANT, DYNAMIC<br/>     14 SECURITY, INC.:<br/>     15 Wesley C. Redmond, Esq.<br/>     16 Ford Harrison LLP<br/>     17 420 20th Street North, Suite 2560<br/>     18 Birmingham, Alabama 35203<br/>     19 205-244-5905<br/>     20 wredmond@fordharrison.com<br/>     21<br/>     22 OTHERS PRESENT:<br/>     23 Chris Whitehead, Esq.<br/>     24 In-house Counsel, Hyundai Motor<br/>     25 Manufacturing, Alabama, Inc.</p> |
| 3 | 010:19 - 011:19 | <p>010:19 MR. MIDDLEBROOKS: Because we have<br/>     20 three defendants here and counsel for each of<br/>     21 the three defendants and plaintiff's got two<br/>     22 counsel, why don't we have everybody state their</p>  |

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|   |                 | <p>23 name for the record and tell you who they<br/>     24 represent and anything else that you want to<br/>     25 say.</p> <p>011:01 Would you state your full name,<br/>     02 Ms. Key.</p> <p>03 THE WITNESS: Davita Key.</p> <p>04 MS. PALMER: Leslie Palmer for Davita<br/>     05 Key.</p> <p>06 MS. LEONARD: Heather Leonard for<br/>     07 Davita Key.</p> <p>08 MR. REDMOND: Wesley Redmond for<br/>     09 Dynamic Security, Inc.</p> <p>10 MR. MILLER: Matt Miller for<br/>     11 Hyundai ENG, America.</p> <p>12 MR. WHITEHEAD: Chris Whitehead. I'm<br/>     13 in-house counsel for HMMA.</p> <p>14 MR. MIDDLEBROOKS: And David<br/>     15 Middlebrooks. I'm representing HMMA, which is<br/>     16 Hyundai Motor Manufacturing, Alabama.</p> <p>17 DAVITA M. KEY,</p> <p>18 Being first duly sworn, was examined and<br/>     19 testified as follows:</p> |
| 4 | 017:21 - 018:01 | <p>017:21 Q. So how many days did you actually go<br/>     22 out to the HMMA plant?</p> <p>23 A. Two.</p> <p>24 Q. And that was on the 31st of July and<br/>     25 the 1st of August?</p> <p>018:01 A. Yes.</p>  |
| 5 | 018:15 - 018:24 | <p>018:15 Q. Who did you interview with?</p> <p>16 A. Gloria Robinson.</p> <p>17 Q. Anybody else?</p> <p>18 A. Maurice Chambliss was sitting in on the<br/>     19 interview.</p> <p>20 Q. Who did they work for, if you know?</p> <p>21 A. Gloria Robinson said that she worked<br/>     22 for Dynamic Security.</p> <p>23 Q. How about Mr. Chambliss?</p> <p>24 A. Dynamic Security.</p>  |
| 6 | 019:10 - 019:24 | <p>019:10 First, how did you learn of the<br/>     11 opportunity?</p> <p>12 A. Indeed.com.</p> <p>13 Q. And Indeed is an online tool that you</p>   |

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|   |                 | <p>14 can apply for jobs through?</p> <p>15 A. Yes.</p> <p>16 Q. And what job did Indeed state that you</p> <p>17 were applying for?</p> <p>18 A. It said -- I'm not sure. I don't -- I</p> <p>19 mean, I'm not sure.</p> <p>20 Q. Okay. Did you know that the job was</p> <p>21 Dynamic Security?</p> <p>22 A. Yes.</p> <p>23 Q. Did you know it was a mail room job?</p> <p>24 A. Yes.</p>   |
| 7 | 021:08 - 022:07 | <p>021:08 Q. So you interviewed with Ms. Robinson</p> <p>09 and Mr. Chambliss sometime around July 19?</p> <p>10 A. Yes.</p> <p>11 Q. And they later -- who made you an</p> <p>12 offer?</p> <p>13 A. Gloria Robinson.</p> <p>14 Q. Did you speak to anybody else about the</p> <p>15 opportunity?</p> <p>16 A. When you say -- I mean, what -- when</p> <p>17 you say did I speak to anybody else -- about</p> <p>18 working for Dynamic? Like working with the job?</p> <p>19 Or did anybody else offer me --</p> <p>20 Q. Well, other than Mr. Chambliss and</p> <p>21 Ms. Robinson, did you speak to anybody else</p> <p>22 before you accepted the job?</p> <p>23 A. No.</p> <p>24 Q. And did they tell you what your pay</p> <p>25 would be?</p> <p>022:01 A. Yes.</p> <p>02 Q. Did they tell you what your benefits</p> <p>03 would be?</p> <p>04 A. They gave me a paper, like the benefits</p> <p>05 sheet from the -- so yes, they did.</p> <p>06 Q. What benefits did Dynamic provide you?</p> <p>07 A. Medical, like health insurance.</p> |
| 8 | 023:10 - 023:13 | <p>023:10 Q. Who trained you?</p> <p>11 A. LaTonya Howell.</p> <p>12 Q. Who did she work for? If you know.</p> <p>13 A. I -- Dynamic Security.</p>   |
| 9 | 023:16 - 026:07 | <p>023:16 Q. Let me show you what we'll mark as</p> <p>17 Defendants' Exhibit Number 2. And it says it's</p>   |

18 a Pre-Application Screening Form. And I've got  
19 a second page which I think is actually a  
20 page from the application.  
21 The Pre-Application Screening Form is  
22 Bates-numbered Dynamic-Key 28. And the second  
23 page is a document produced by your counsel  
24 Bates-numbered Key 13.  
25 Let me show it to you and ask you if  
024:01 you recognize it.  
02 A. Yes.  
03 Q. And is it your writing on both of these  
04 pages?  
05 A. Yes.  
06 Q. Did anybody tell you what to write?  
07 A. No.  
08 Q. On the first page, it says "position  
09 applied for." You see it says "mail room  
10 clerk"?  
11 A. Yes.  
12 Q. And, again, why did you pick that  
13 position?  
14 A. Because I had experience in it.  
15 Q. And you say in the next sentence "How  
16 did you hear of Dynamic Security?" You put down  
17 "indeed.com." Had you known anything about  
18 Dynamic Security other than from Indeed?  
19 A. No.  
20 Q. Then on the next page, what is that  
21 document?  
22 A. It's part of the employment  
23 application.  
24 Q. And that's your writing on the top part  
25 of the page?  
025:01 A. Yes.  
02 Q. And your signature at the bottom of the  
03 page?  
04 A. Yes.  
05 Q. And everything you put in the  
06 application you filled out -- again, we don't  
07 have the first page of it, but -- was accurate?  
08 A. Yes.  
09 Q. Now, if you would, look at the third  
10 paragraph above your signature. It says "I

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|    |                 | <p>11 understand that compliance with the company's<br/>     12 policies and procedures is a condition of my<br/>     13 employment." Did you read that when you signed<br/>     14 this?</p> <p>15 A. Yes.</p> <p>16 Q. It also indicates in the last paragraph<br/>     17 that you are hired at will. Did you read that<br/>     18 when you signed it?</p> <p>19 A. Yes.</p> <p>20 Q. This shows a date of July 21, 2017. Is<br/>     21 that correct?</p> <p>22 A. Yes.</p> <p>23 Q. Had you already interviewed with<br/>     24 Ms. Robinson? Or could this be the date you<br/>     25 interviewed?</p> <p>026:01 A. I had already interviewed with her.</p> <p>02 Q. Did you ever fill out a job application<br/>     03 for HEA, America -- ENG, America?</p> <p>04 A. Not that I recall.</p> <p>05 Q. Did you ever fill out an application<br/>     06 for HMMA?</p> <p>07 A. Not that I recall.</p> |
| 10 | 027:10 - 027:21 | <p>027:10 (Defendants' Exhibit 3 was marked<br/>     11 for identification.)</p> <p>12 Q. I show you what has been marked as<br/>     13 Defendants' Exhibit Number 3. And you recognize<br/>     14 this as a check and a pay stub?</p> <p>15 A. Yes.</p> <p>16 Q. And who's this check from?</p> <p>17 A. It says Dynamic Security.</p> <p>18 Q. Ms. Robinson had already told you that<br/>     19 you would be paid by Dynamic Security, didn't<br/>     20 she?</p> <p>21 A. Yes.</p>  |
| 11 | 028:01 - 028:04 | <p>028:01 Q. Did you ever get a check from anyone<br/>     02 else associated with your assignment to the mail<br/>     03 room?</p> <p>04 A. No.</p>   |
| 12 | 029:08 - 029:18 | <p>029:08 Is there anything -- any terms of your<br/>     09 offer that were made to you that's not included<br/>     10 in this email? Other than the benefits<br/>     11 statement you said they gave you?</p>   |

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|    |                 | <p>12 A. I mean, this doesn't offer me anything.</p> <p>13 It just says what I'm supposed to do.</p> <p>14 Q. Okay.</p> <p>15 A. So yes.</p> <p>16 Q. And what else did you get besides the</p> <p>17 benefits statement that was part of your offer?</p> <p>18 A. My pay.</p>  |
| 13 | 029:20 - 029:25 | <p>029:20 Now, you had to go to Hyundai or HMMA</p> <p>21 training center for a safety class before you</p> <p>22 could begin work; is that correct?</p> <p>23 A. Yes.</p> <p>24 Q. Did you do that?</p> <p>25 A. Yes.</p>  |
| 14 | 031:03 - 031:23 | <p>031:03 A. You said was I told anything?</p> <p>04 Q. Anything other than what's in that</p> <p>05 email about your HMMA assignment.</p> <p>06 A. Yes.</p> <p>07 Q. What were you told?</p> <p>08 A. Gloria Robinson emailed me about the</p> <p>09 start date.</p> <p>10 Q. Okay. And who was to be your</p> <p>11 supervisor when you went to work?</p> <p>12 A. My immediate supervisor was Maurice</p> <p>13 Chambliss.</p> <p>14 Q. And who was his supervisor, if you</p> <p>15 know?</p> <p>16 A. I don't know who his supervisor was.</p> <p>17 Q. Did you report to anybody other than</p> <p>18 Mr. Chambliss?</p> <p>19 A. I never reported to him.</p> <p>20 Q. Did you report to anybody?</p> <p>21 A. Gloria Robinson.</p> <p>22 Q. Was she the only one?</p> <p>23 A. Yes.</p> |
| 15 | 032:25 - 033:17 | <p>032:25 Q. If you look on the second page, it says</p> <p>033:01 Ray Cureton. And who is he?</p> <p>02 A. He worked at Dynamic Security.</p> <p>03 Q. And what was his job, if you know?</p> <p>04 A. I don't know.</p> <p>05 Q. And what was your reason for talking</p> <p>06 with him?</p> <p>07 A. Because I asked to speak to human</p>  |

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|    |                 | <p>08 resources.</p> <p>09 Q. And he was human resources? Or that's</p> <p>10 who they sent you to?</p> <p>11 A. I was told he was human resources.</p> <p>12 Q. Who told you that?</p> <p>13 A. Gloria Robinson.</p> <p>14 Q. And where did you speak to Mr. Cureton?</p> <p>15 A. At the Dynamic Security office.</p> <p>16 Q. Which is where?</p> <p>17 A. On Wares Ferry Road.</p>   |
| 16 | 035:22 - 038:05 | <p>035:22 Q. What race is Mr. Cureton?</p> <p>23 A. White.</p> <p>24 Q. What race is Tonya?</p> <p>25 A. African American.</p> <p>036:01 Q. And Cassandra Williams, who does she</p> <p>02 work for?</p> <p>03 A. I don't know.</p> <p>04 Q. And why were you interacting with her?</p> <p>05 A. Gloria Robinson interacted with her,</p> <p>06 asked her a question concerning me.</p> <p>07 Q. And what was that question?</p> <p>08 A. About my hair.</p> <p>09 Q. Did you ever speak to Ms. -- you</p> <p>10 actually spoke to Ms. Williams about your hair?</p> <p>11 A. Yes.</p> <p>12 Q. Did you speak to Ms. Williams about</p> <p>13 anything other than your hair?</p> <p>14 A. No.</p> <p>15 Q. And who was present when you spoke to</p> <p>16 Ms. Williams?</p> <p>17 A. Gloria Robinson.</p> <p>18 Q. And on how many occasions did you speak</p> <p>19 to Mr. Maurice Chambliss?</p> <p>20 A. I talked to him once. No. I talked to</p> <p>21 him twice.</p> <p>22 Q. Was the first time the interview?</p> <p>23 A. No, because he didn't say anything.</p> <p>24 Q. Okay. What were the two occasions</p> <p>25 where you talked with him?</p> <p>037:01 A. My first day at work and on August 1st.</p> <p>02 Q. And what were the reasons you were</p> <p>03 speaking to him on those occasions?</p> |

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|    |                 | <p>04 A. On my first day of work, to give him a<br/>     05 note from my doctor. And on August 1st, to tell<br/>     06 him I would like to speak with human resources.</p> <p>07 Q. <b>And did he send you to Ray Cureton?</b></p> <p>08 A. No.</p> <p>09 Q. <b>What did he do?</b></p> <p>10 A. Called Gloria Robinson.</p> <p>11 Q. <b>And she sent you to Ray Cureton?</b></p> <p>12 A. She told him to -- that I could go,<br/>     13 yes.</p> <p>14 Q. <b>What race is Mr. Chambliss?</b></p> <p>15 A. African American.</p> <p>16 Q. <b>And what race is Ms. Williams?</b></p> <p>17 A. African American.</p> <p>18 Q. <b>Gloria Robinson, we've already talked</b><br/>     19 <b>about her. And you said she worked for Dynamic?</b></p> <p>20 A. Yes.</p> <p>21 Q. <b>Who all did you share the information</b><br/>     22 <b>with that you were pregnant? Out here. Not</b><br/>     23 <b>personally.</b></p> <p>24 A. I told Gloria Robinson and Maurice and<br/>     25 then my trainer.</p> <p>038:01 Q. <b>Trainer being Tonya?</b></p> <p>02 A. Yes, Tonya.</p> <p>03 Q. <b>Now, let me ask you. Ms. Cassandra</b><br/>     04 <b>Williams, what race is she?</b></p> <p>05 A. African American.</p> |
| 17 | 039:18 - 041:08 | <p>039:18 Q. <b>In the course of your two days that you</b><br/>     19 <b>were out here at the HMMA plant, is there</b><br/>     20 <b>anybody else you can recall speaking to at all</b><br/>     21 <b>other than what's on this Defendants' Exhibit 5?</b></p> <p>22 A. When you say speaking to, what do you<br/>     23 mean?</p> <p>24 Q. <b>If you spoke to anybody else that you</b><br/>     25 <b>can recall.</b></p> <p>040:01 A. I said good morning to the person who<br/>     02 took my ID picture.</p> <p>03 Q. <b>All right. Anything else?</b></p> <p>04 A. No.</p> <p>05 Q. <b>Did you ever see any organizational</b><br/>     06 <b>charts at any time during your assignment out at</b><br/>     07 <b>Hyundai Motor Manufacturing, Alabama?</b></p>   |

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|    |                 | <p>08 A. What do you mean by organizational<br/>09 charts?</p> <p>10 Q. Something that shows who reports to<br/>11 whom and things of that nature?</p> <p>12 A. No.</p> <p>13 Q. Can you name anybody that you know for<br/>14 a fact was actually employed directly by Hyundai<br/>15 Motor Manufacturing, Alabama?</p> <p>16 A. I don't -- I don't know who was<br/>17 employed with them.</p> <p>18 Q. To your understanding, who selected you<br/>19 to be assigned to the mail room?</p> <p>20 A. You say do I understand who selected<br/>21 me?</p> <p>22 Q. Who assigned you that -- gave you that<br/>23 assignment?</p> <p>24 A. Do you mean person or company?</p> <p>25 Q. Person.</p> <p>041:01 A. Yes.</p> <p>02 Q. Who was that?</p> <p>03 A. Gloria Robinson.</p> <p>04 Q. Do you know what company assigned you?</p> <p>05 Ms. Robinson worked for Dynamic; right?</p> <p>06 A. Yes.</p> <p>07 Q. So were you assigned by Dynamic?</p> <p>08 A. Yes.</p> |
| 18 | 041:24 - 043:03 | <p>041:24 Q. When did you first learn that your<br/>25 assignment to the mail room position at Hyundai<br/>042:01 Motor Manufacturing, Alabama would end?</p> <p>02 A. August 1st.</p> <p>03 Q. And how did you learn that?</p> <p>04 A. Ray Cureton.</p> <p>05 Q. And what specifically did he tell you?</p> <p>06 A. "They don't want you out there."</p> <p>07 Q. Did he say who "they" were?</p> <p>08 A. Gloria Robinson.</p> <p>09 Q. Anyone else?</p> <p>10 A. He just said her by name.</p> <p>11 Q. And did he say why she didn't want you<br/>12 out there?</p> <p>13 A. Because of my hair and something else.</p> <p>14 Q. Did he say what something else was?</p>  |

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|    |                 | <p>15 A. He said he didn't want to get into it.</p> <p>16 Q. And that's the extent of what he said</p> <p>17 about the reason?</p> <p>18 A. Yes.</p> <p>19 Q. Did anyone else give you a reason why</p> <p>20 your assignment was ending?</p> <p>21 A. No.</p> <p>22 Q. Did you speak to anyone else at Dynamic</p> <p>23 about that?</p> <p>24 A. No.</p> <p>25 Q. How about at HEA?</p> <p>043:01 A. No.</p> <p>02 Q. How about HMMA?</p> <p>03 A. No.</p>  |
| 19 | 044:10 - 044:12 | <p>044:10 Q. And you identified Dynamic as your</p> <p>11 employer to the State of Alabama?</p> <p>12 A. Yes.</p>   |
| 20 | 047:10 - 047:22 | <p>047:10 Q. Do you recall getting a handbook from</p> <p>11 HMMA, Hyundai Motor Manufacturing, Alabama?</p> <p>12 A. A safety handbook.</p> <p>13 Q. So the only handbook you got from</p> <p>14 Hyundai Motor Manufacturing, Alabama was a</p> <p>15 safety handbook?</p> <p>16 A. Yes.</p> <p>17 Q. And who gave that to you?</p> <p>18 A. I got it when I went to my safety</p> <p>19 training class.</p> <p>20 Q. To your knowledge, did everyone who</p> <p>21 go -- went to that class get a copy?</p> <p>22 A. Yes.</p>                               |
| 21 | 048:16 - 053:22 | <p>048:16 Q. Okay. Do you have any knowledge of</p> <p>17 anybody who worked for Hyundai Motor</p> <p>18 Manufacturing, Alabama knowing you were</p> <p>19 pregnant?</p> <p>20 A. I don't know who works for them.</p> <p>21 Q. You've told me all the people you've</p> <p>22 talked to about your pregnancy?</p> <p>23 A. Yes.</p> <p>24 Q. While you were out at the Hyundai Motor</p> <p>25 Manufacturing, Alabama facility, what grooming</p> <p>049:01 policies did you ever see regarding your</p> <p>02 employment, employment by Dynamic or your</p> |

03 assignment at the facility out here?  
04 A. Dynamic policy just was to be neatly --  
05 your appearance had to be neat.  
06 Q. And tell me the circumstances of you  
07 seeing that policy.  
08 A. It was in the handbook they provided  
09 me.  
10 Q. Did you ever see any other policy of  
11 Dynamic about grooming?  
12 A. No.  
13 Q. Did you ever see any policies about  
14 grooming from HEA ENG, America?  
15 A. Who worked for HEA?  
16 Q. Well, I can tell you one person that  
17 did, but --  
18 A. Okay.  
19 Q. -- I'm not testifying. So I don't know  
20 if I --  
21 MS. PALMER: Just answer the questions  
22 as best you can.  
23 A. Okay. Can you repeat the question?  
24 MR. MIDDLEBROOKS: What was the  
25 question?  
050:01 (Record read as follows:  
02 "Question: Did you ever see any  
03 policies about grooming from HEA, ENG America?"  
04 Q. (BY MR. MIDDLEBROOKS:) You answered.  
05 Let me ask you. Did you ever see any  
06 grooming policies that were provided to you by  
07 Cassandra Williams?  
08 A. Yes.  
09 Q. And did you get a copy of that?  
10 A. No.  
11 Q. What were the circumstances of you  
12 seeing that?  
13 A. I asked to see it.  
14 Q. And did she show it to you?  
15 A. Reluctantly.  
16 Q. Well --  
17 A. Yeah, she showed it to me.  
18 Q. Okay. And what do you recall seeing  
19 when you looked at it?  
20 A. It was a document on her computer in

21 Microsoft Word that said uniformed officers,  
22 females.  
23 Q. And what do you recall it said?  
24 A. Females could not wear dreadlocks.  
25 Q. And it was on her computer?  
051:01 A. Yes.  
02 Q. It was never printed out?  
03 A. No.  
04 (Defendants' Exhibit 8 was marked  
05 for identification.)  
06 Q. Exhibit 8. This document says  
07 "Appearance Standards for Security Personnel,"  
08 three pages long and Bates numbers HEA 1, 2, and  
09 3.  
10 Have you ever seen this document  
11 before?  
12 A. This is what was on the computer, the  
13 first page.  
14 Q. Just the first page?  
15 A. That's the only page I saw.  
16 Q. Well, it says, okay, under "Female  
17 Officers, Hair," drop way down to the end of  
18 that section, "Braids are permitted, but must be  
19 well groomed and kept. Dreads or dreadlocks  
20 hairstyle are prohibited." That's what you saw?  
21 A. Yes.  
22 Q. She didn't show you the second page?  
23 A. No.  
24 Q. Look at the second page. Do you see  
25 where it says "Male Officers"? "Male Uniform  
052:01 Officers"?  
02 A. Yes.  
03 Q. Drop down about halfway in that  
04 section, you'll see "Braids and/or dreads not  
05 permitted." Did I read that correctly?  
06 A. Yes.  
07 Q. So for male officers, according to this  
08 policy, dreadlocks were not permitted for them  
09 either?  
10 A. Yes, according to this policy.  
11 (Defendants' Exhibit 9 was marked  
12 for identification.)  
13 Q. I'll show you what we're going to mark

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|    |                 | <p>14 as Defendants' Exhibit Number 9. And it's<br/>     15 Bates-numbered HMMA 0003.</p> <p>16 (Pause.)</p> <p>17 Q. I show you what's been marked as<br/>     18 Defendants' Exhibit Number 9, Bates-numbered,<br/>     19 again, HMMA 3. And it's entitled "Hyundai Motor<br/>     20 Manufacturing, Alabama PPE &amp; Dress Code Matrix."</p> <p>21 Ms. Key, have you ever seen Defendants'<br/>     22 Exhibit 9 before?</p> <p>23 A. I don't know. I don't know if I've<br/>     24 seen this. I don't...</p> <p>25 I don't -- I don't know. I don't<br/>     053:01 remember it.</p> <p>02 Q. You don't remember one way or the<br/>     03 other?</p> <p>04 A. Yeah, I don't remember.</p> <p>05 Q. Well, it says, the application, if you<br/>     06 look at the top, "Requirements for Entering the<br/>     07 Work Areas," and identifies "PPE required in<br/>     08 production areas." You didn't work in the<br/>     09 production area, did you?</p> <p>10 A. No.</p> <p>11 Q. Okay. It doesn't say anything about<br/>     12 folks who were in security, does it?</p> <p>13 A. No.</p> <p>14 Q. But down under "Personal Hygiene" at<br/>     15 the bottom, it does have one entry there about<br/>     16 hair. The only thing it says, "Hair longer than<br/>     17 collar length -- tied back or tucked in hat."<br/>     18 That's all it says, isn't it?</p> <p>19 A. Yes.</p> <p>20 Q. There's no mention one way or the other<br/>     21 about dreadlocks, is there?</p> <p>22 A. Not on this paper, no.</p> |
| 22 | 056:16 - 057:03 | <p>056:16 Q. I show you what's marked as Defendants'<br/>     17 Exhibit Number 12. Ms. Key, do you recognize<br/>     18 this document entitled "Hyundai Motor<br/>     19 Manufacturing, Alabama Safety, Security and Fire<br/>     20 Protection Handbook"?</p> <p>21 A. Yes.</p> <p>22 Q. Is that the document you received when<br/>     23 you went to safety training?</p>   |

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|    |                 | <p>24 A. Yes.</p> <p>25 Q. It's Bates-numbered Key 277 through<br/>057:01 Key 331. And this is the only document you were<br/>02 given by Hyundai?</p> <p>03 A. Yes.</p>   |
| 23 | 058:16 - 058:18 | <p>058:16 Q. So you never saw any other type of<br/>17 handbook for HMMA, did you?</p> <p>18 A. No.</p>  |
| 24 | 062:02 - 062:17 | <p>062:02 Q. (BY MR. MIDDLEBROOKS:) All right.</p> <p>03 Let's look down this document. First page is<br/>04 Bates Key 49. Last page is Bates Key 56. And<br/>05 under item 2, midway down the page, "I believe I<br/>06 was discriminated against by the following<br/>07 organizations: (Check those that apply)." And<br/>08 you checked "Employer" and "Other." And there<br/>09 you write "Ms. Gloria Robinson and Ms. Cassandra<br/>10 Williams." Do you see that?</p> <p>11 A. Yes.</p> <p>12 Q. And why did you choose to name those<br/>13 two people?</p> <p>14 A. Because those were the two people who I<br/>15 felt discriminated against me.</p> <p>16 Q. Anyone else?</p> <p>17 A. Their employers.</p> |
| 25 | 063:24 - 065:01 | <p>063:24 Q. It says, "No reasons were given except<br/>25 I was told the Koreans who own the company<br/>064:01 didn't want BLKS" -- Blacks? Does that stand<br/>02 for blacks?</p> <p>03 A. Yes.</p> <p>04 Q. -- "wearing their hair a certain way."<br/>05 Who told you that?</p> <p>06 A. Gloria Robinson.</p> <p>07 Q. Did anybody else tell you that?</p> <p>08 A. No.</p> <p>09 Q. Did she say where she knew that from?</p> <p>10 A. She said they send memos.</p> <p>11 Q. Did you see any memos?</p> <p>12 A. I can only go by what she told me.</p> <p>13 Q. You haven't seen any memos?</p> <p>14 A. No.</p> <p>15 Q. And she said "They send memos." Did<br/>16 she say who "they" is?</p>                |

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|    |                 | <p>17 A. You'd have to ask her that.</p> <p>18 Q. Okay. I mean, when you say Koreans --</p> <p>19 A. She said Koreans. So you would have --</p> <p>20 Q. I mean, Koreans are like any</p> <p>21 nationality. There's any number of Koreans, all</p> <p>22 types of Koreans.</p> <p>23 A. She said Koreans who owned the company.</p> <p>24 Q. Which company?</p> <p>25 A. You would have to ask her that</p> <p>065:01 question.</p>   |
| 26 | 067:08 - 067:10 | <p>067:08 Q. But you never saw any such memos like</p> <p>09 that?</p> <p>10 A. No.</p>  |
| 27 | 069:11 - 070:19 | <p>069:11 (Defendants' Exhibit 15 was marked</p> <p>12 for identification.)</p> <p>13 Q. I show you what we marked as</p> <p>14 Defendants' Exhibit Number 15 entitled "Charge</p> <p>15 of Discrimination" Bates number Key 47, charge</p> <p>16 of discrimination against Hyundai Motor</p> <p>17 Manufacturing, Alabama. Do you recognize this</p> <p>18 charge?</p> <p>19 A. Yes.</p> <p>20 Q. Now, here it shows dates the</p> <p>21 discrimination took place, it shows August 1 is</p> <p>22 the earliest, 2017, and the latest was August 1,</p> <p>23 2017. So that's correct?</p> <p>24 A. It should say July 31st to August 1st.</p> <p>25 Q. What discrimination took place on</p> <p>070:01 July 31st?</p> <p>02 A. They sent me home.</p> <p>03 Q. On July --</p> <p>04 A. 31st.</p> <p>05 Q. -- 31st.</p> <p>06 What's the date that you signed this</p> <p>07 charge?</p> <p>08 A. It says October 16, 2018.</p> <p>09 Q. Well, do you agree that's the date you</p> <p>10 signed it?</p> <p>11 A. Yes, because I -- yes, I signed it that</p> <p>12 date.</p> <p>13 Q. Why was this charge signed or filed</p> <p>14 with the EEOC some 14 or so months after you</p> |

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|    |                 | <p>15 filed the one with the EEOC about Dynamic?</p> <p>16 A. The -- this is the investigator sent me</p> <p>17 this document that was assigned to my case.</p> <p>18 Q. Why is it being filed now?</p> <p>19 A. You would have to ask the investigator.</p>   |
| 28 | 075:01 - 076:02 | <p>075:01 Look at Interrogatory Number 11.</p> <p>02 Midway down, your answer to Number 11 says</p> <p>03 "Plaintiff states Gloria Robinson, Cassandra,</p> <p>04 Williams, Ray Cureton, LaTonya Howell, Maurice</p> <p>05 Chambliss, and Nicole Scavella were all involved</p> <p>06 in the termination decision and subject to the</p> <p>07 control and the policy of Hyundai."</p> <p>08 Was anybody else involved in that</p> <p>09 termination decision other than those you named</p> <p>10 there?</p> <p>11 A. I don't -- I don't know.</p> <p>12 Q. You don't know of anybody you could</p> <p>13 name?</p> <p>14 A. I don't know if anybody else was</p> <p>15 involved.</p> <p>16 Q. Now, you say "subject to control or</p> <p>17 policy of HMMA." Is that your words or somebody</p> <p>18 else's?</p> <p>19 A. I worked with my attorney.</p> <p>20 Q. Anyone else?</p> <p>21 A. No.</p> <p>22 Q. So that language is not solely your</p> <p>23 language?</p> <p>24 A. I mean, I worked with my attorneys to</p> <p>25 prepare it, so.</p> <p>076:01 Q. You had input?</p> <p>02 A. Of my attorneys.</p> |
| 29 | 076:15 - 077:11 | <p>076:15 Q. Okay. What policy were they carrying</p> <p>16 out?</p> <p>17 A. Of HMMA.</p> <p>18 Q. But what policy of HMMA?</p> <p>19 A. Concerning my appearance.</p> <p>20 Q. Your hairstyle?</p> <p>21 A. Yes.</p> <p>22 Q. Is that the only policy?</p> <p>23 A. I don't know.</p> <p>24 Q. You don't know of any other policy you</p>  |

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|    |                 | <p>25 referred to?</p> <p>077:01 A. I don't know if that was the only</p> <p>02 policy.</p> <p>03 Q. But you don't know of any other policy</p> <p>04 you're referring to?</p> <p>05 A. I don't know if that was the only</p> <p>06 policy.</p> <p>07 Q. I understand that.</p> <p>08 A. That's my answer.</p> <p>09 Q. All right.</p> <p>10 A. Because I don't know of any other</p> <p>11 policy.</p>  |
| 30 | 078:09 - 079:07 | <p>078:09 Q. Okay. So that's who you're referring</p> <p>10 to or she's referring to, to your understanding,</p> <p>11 when she talks about the Koreans?</p> <p>12 A. You would have to ask her, but --</p> <p>13 Q. So this is an assumption, the</p> <p>14 parenthetical?</p> <p>15 A. I was here at the Hyundai site, and I</p> <p>16 don't think she would say Koreans that's in</p> <p>17 South Korea or North Korea. So I would think --</p> <p>18 Q. Well, you say, "I don't think." Do you</p> <p>19 know?</p> <p>20 A. Yes. That's who she was referring to.</p> <p>21 Q. HMMA and HEA?</p> <p>22 A. Yes.</p> <p>23 Q. How do you know that?</p> <p>24 A. Because she said that she even had to</p> <p>25 have her supervisor talk to the Koreans here</p> <p>079:01 because they wouldn't talk to her directly</p> <p>02 because she was a female.</p> <p>03 Q. And did she say which Koreans those</p> <p>04 were?</p> <p>05 A. She did not identify them by name.</p> <p>06 Q. Just Koreans?</p> <p>07 A. Yes.</p> |
| 31 | 085:11 - 086:08 | <p>085:11 Q. Tell me what college you have, college</p> <p>12 education you have?</p> <p>13 A. I attended Auburn University,</p> <p>14 Montgomery where I got my bachelor's degree, and</p> <p>15 Troy University where I got my master's.</p> <p>16 Q. And what's your bachelor's degree in at</p>  |

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|    |                 | <p>17 AUM?</p> <p>18 A. Humanities and social sciences.</p> <p>19 Q. What year was that?</p> <p>20 A. 2011.</p> <p>21 Q. And I'm sure I have this somewhere in</p> <p>22 my file. What's your date of birth?</p> <p>23 A. 12/10/85.</p> <p>24 Q. All right. And what was your master's</p> <p>25 degree at Troy in?</p> <p>086:01 A. Troy University.</p> <p>02 Q. Yeah. What was your master's in?</p> <p>03 A. Social sciences.</p> <p>04 Q. And when did you get it?</p> <p>05 A. 2017.</p> <p>06 Q. This was before you went to work for</p> <p>07 Dynamic Security; right?</p> <p>08 A. Yes.</p>   |
| 32 | 115:01 - 115:09 | <p>115:01 Q. Okay. All right. And before beginning</p> <p>02 work on July 31st, you had not told Dynamic that</p> <p>03 you were pregnant; right?</p> <p>04 A. No.</p> <p>05 Q. Okay. Is that because at the time of</p> <p>06 your interview, did you know that you --</p> <p>07 A. Yes.</p> <p>08 Q. -- were pregnant?</p> <p>09 A. Yes.</p>  |
| 33 | 115:18 - 117:05 | <p>115:18 Q. Okay. So tell me about the</p> <p>19 conversation you had where you were talking with</p> <p>20 Gloria Robinson about your being pregnant.</p> <p>21 A. I just pulled her to the side and gave</p> <p>22 her my doctor's note letting her know, and</p> <p>23 Maurice, that I was -- that even though that I</p> <p>24 was pregnant, that my doctor said that I'm able</p> <p>25 to perform all the duties of the job.</p> <p>116:01 Q. All right. Anything else said about</p> <p>02 your pregnancy during that conversation?</p> <p>03 A. She said I didn't need to talk to her</p> <p>04 about that.</p> <p>05 Q. Did not need to talk to her?</p> <p>06 A. Because she wasn't my immediate</p> <p>07 supervisor.</p> <p>08 Q. So was she indicating to you that that</p> |

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|    |                 | <p>09 was an issue to be talked about with<br/>     10 Mr. Chambliss? Or with someone at Hyundai?<br/>     11 A. With Mr. Chambliss, but he was standing<br/>     12 right there with her.<br/>     13 Q. Anything else said about the pregnancy?<br/>     14 A. Not at that conversation.<br/>     15 Q. Okay. And from what you told me<br/>     16 earlier, was there also something said at that<br/>     17 same time about your hair?<br/>     18 A. Afterwards, yes, it was.<br/>     19 Q. What do you mean by afterwards?<br/>     20 A. After she went back in her office, I<br/>     21 was confronted by Cassandra Williams.<br/>     22 Q. Okay. And when you say after "she,"<br/>     23 that's Gloria Robinson that you are talking<br/>     24 about?<br/>     25 A. Yes.</p> <p>117:01 Q. How long was it before Cassandra<br/>     02 Williams said something to you?<br/>     03 A. Maybe between 10 and 20 minutes.<br/>     04 Q. And what did Ms. Williams say to you?<br/>     05 A. "What's wrong with your hair?"</p> |
| 34 | 117:14 - 117:25 | <p>117:14 Q. Now, did somebody send you home early<br/>     15 on that -- well, these conversations that you're<br/>     16 telling me about where you told Gloria Robinson<br/>     17 you were pregnant and then Cassandra Williams<br/>     18 came out later, were these on the 31st or the<br/>     19 1st?<br/>     20 A. 31st.<br/>     21 Q. Did someone send you home early on the<br/>     22 31st?<br/>     23 A. Yes.<br/>     24 Q. Who told you to go home?<br/>     25 A. Gloria Robinson.</p>   |
| 35 | 118:13 - 118:21 | <p>118:13 She said that Cassandra Williams said<br/>     14 that I was in violation with my hair. And I<br/>     15 said, "What do you want me to do?"<br/>     16 Cassandra Williams said that, "You<br/>     17 would have to wear a hat."<br/>     18 I said, "I have a hat at my house. I<br/>     19 can go get it."<br/>     20 She said -- then Gloria Robinson said,</p>  |

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|    |                 | <p>21 "No. How about you just go home."</p>   |
| 36 | 119:08 - 120:02 | <p>119:08 Q. All right. I think you told me were<br/>09 there other conversations that you had with<br/>10 Ms. Robinson about your pregnancy?</p> <p>11 A. Yes.</p> <p>12 Q. All right. Tell me about those.</p> <p>13 A. She brought me into the office and she<br/>14 asked me was I going to act this way until --<br/>15 and she pointed to my stomach.</p> <p>16 Q. When did that happen?</p> <p>17 A. August 1st.</p> <p>18 Q. Do you know what she was referring to<br/>19 when she said "act this way"?</p> <p>20 A. No. And she called me after I -- she<br/>21 sent me home on July 31st and asked me when was<br/>22 my baby due and if my doctor was aware of my job<br/>23 requirements.</p> <p>24 Q. This was she called you the -- she<br/>25 called you on July 31st after she sent you home;<br/>120:01 right?</p> <p>02 A. Yes.</p> |
| 37 | 120:13 - 122:03 | <p>120:13 Q. All right. So when she called -- the<br/>14 conversation you told us about when she called<br/>15 you on the telephone, that was before she said<br/>16 to you on August 1, "Are you going to act this<br/>17 way"?</p> <p>18 A. Yes.</p> <p>19 Q. Tell me was anything else said in that<br/>20 conversation on August 1?</p> <p>21 A. I asked her was this about my hair.<br/>22 And she said, "This -- we not talking about<br/>23 that."</p> <p>24 Q. And by "that," you understood -- when<br/>25 she used the word "that," you understood that<br/>121:01 the reference was to your hair; correct?</p> <p>02 A. Yes.</p> <p>03 Q. What else was said in that<br/>04 conversation?</p> <p>05 A. She asked me if I had felt<br/>06 discriminated against.</p> <p>07 Q. And this is all part of the same<br/>08 conversation?</p>     |

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|    |                 | <p>09 A. Yes.</p> <p>10 Q. And what did you tell her?</p> <p>11 A. I said, "No comment."</p> <p>12 Q. Is there a reason why you wouldn't tell<br/>13 her anything other than, "No comment"?</p> <p>14 A. Because of her demeanor towards me.</p> <p>15 Q. Describe her demeanor for us.</p> <p>16 A. She was sitting on the edge of her<br/>17 chair. Her legs were spread and she was leaning<br/>18 forward and talking in a very aggravated and<br/>19 agitated voice and pointing her finger at me.</p> <p>20 Q. Anything else said during that<br/>21 conversation?</p> <p>22 A. No. I just kept asking her was this --<br/>23 you know, "I wore a hat as complied; you know,<br/>24 as you guys asked me to," and she said, "This<br/>25 not about that. This is going to be a problem."</p> <p>122:01 Q. And what did you understand Gloria<br/>02 Robinson was referring to?</p> <p>03 A. I don't know. You'll have to ask her.</p> |
| 38 | 125:13 - 126:06 | <p>125:13 Q. Okay. When you said "I was informed by<br/>14 Dynamic Security, Inc.," are you referring to<br/>15 Ray Cureton here?</p> <p>16 A. Ray Cureton and Gloria Robinson.</p> <p>17 Q. Okay. Well, did Ms. Robinson tell you<br/>18 that you were not going to be allowed to<br/>19 continue to work at the site?</p> <p>20 A. Through Ray Cureton.</p> <p>21 Q. Through -- but Ms. Robinson didn't tell<br/>22 you that you weren't going to be allowed to<br/>23 continue to work at the site, did she?</p> <p>24 A. She told Ray Cureton.</p> <p>25 Q. She told Ray Cureton, who told you;<br/>126:01 right?</p> <p>02 A. Yes.</p> <p>03 Q. Okay. But this says "Ms. Williams did<br/>04 not want me to return to work." Ms. Williams,<br/>05 that's Cassandra Williams?</p> <p>06 A. Yes.</p>   |
| 39 | 127:01 - 127:25 | <p>127:01 Q. Your initial interview was on July 19;<br/>02 correct?</p> <p>03 A. Yes.</p>   |

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|    |                 | <p>04       Q.     Now, earlier you had testified that you<br/>     05     were interviewed by Gloria Robinson and Maurice<br/>     06     Chambliss. And then you have here Cassandra<br/>     07     Williams also participated. You see that in the<br/>     08     first few sentences of this paragraph?</p> <p>09       A.     Yes.</p> <p>10       Q.     What was Ms. Williams's participation<br/>     11     in the interview?</p> <p>12       A.     Gloria Robinson asked her a question<br/>     13     pertaining to me and working at the Hyundai<br/>     14     site.</p> <p>15       Q.     And it was about your hair; right?</p> <p>16       A.     Yes.</p> <p>17       Q.     It was a question whether or not your<br/>     18     hair was appropriate; right?</p> <p>19       A.     Yes.</p> <p>20       Q.     And you were told -- were you told<br/>     21     during that interview process that your hair was<br/>     22     not acceptable as it was?</p> <p>23       A.     No.</p> <p>24       Q.     What --</p> <p>25       A.     I was told that they did not know. And</p>   |
| 40 | 128:19 - 129:16 | <p>128:19      Q.     And was there some discussion about how<br/>     20     you could wear it?</p> <p>21       A.     During my interview, I showed Gloria<br/>     22     Robinson a picture of an up-do hairstyle that I<br/>     23     had and she said, "Oh, well," she said, you<br/>     24     know, "Could you get it styled like that?" I<br/>     25     said, "I'll have to call my stylist, but yes."</p> <p>129:01      Q.     And did you get that done before you<br/>     02     came to work the first day?</p> <p>03       A.     No.</p> <p>04       Q.     Why not?</p> <p>05       A.     Because during my training at Dynamic<br/>     06     Security, I asked the office manager Nicole was<br/>     07     there an issue with my hair and she asked me<br/>     08     why, and I told her that I was told by Gloria<br/>     09     Robinson that it was. And she said, "No,<br/>     10     there's not an issue with your hair. It seems<br/>     11     to comply with our grooming policy."</p> <p>12       Q.     So the reason why you thought your hair<br/>     13     was okay when you came to work on July 31st was</p> |

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|    |                 | <p>14 because the Dynamic office manager had told you<br/>     15 that it was?<br/>     16 A. The Dynamic handbook as well.</p>   |
| 41 | 135:02 - 135:20 | <p>135:02 Q. Okay. So you interviewed on July 19th.<br/>     03 You went to the Dynamic facility on July the<br/>     04 21st?<br/>     05 A. Yes.<br/>     06 Q. Was that for orientation?<br/>     07 A. Yes.<br/>     08 Q. And how long were you at the Dynamic<br/>     09 facility?<br/>     10 A. I don't remember.<br/>     11 Q. I mean, was it all day? A couple<br/>     12 hours?<br/>     13 A. I mean, I don't remember.<br/>     14 Q. Who did you meet with at the Dynamic<br/>     15 facility on that day?<br/>     16 A. I mean, the person who was in charge of<br/>     17 the training. I don't know their name.<br/>     18 Q. And that's when you were given copy of<br/>     19 the handbooks and other policies?<br/>     20 A. Yes.</p>  |
| 42 | 138:13 - 139:23 | <p>138:13 Q. I apologize if I've asked that already.<br/>     14 And your trainer was Ms. Howell; right?<br/>     15 A. Yes.<br/>     16 Q. So what did you and Ms. Howell do next?<br/>     17 A. We went to -- she -- we went to the<br/>     18 mail room. She showed me where the mail room<br/>     19 was.<br/>     20 Q. And the mail room is somewhere on this<br/>     21 floor?<br/>     22 A. I don't know. I mean, I don't know<br/>     23 where it is. I don't remember.<br/>     24 Q. But is it in the --<br/>     25 A. It's not in this building, no.<br/>     139:01 Q. Okay. The mail room's in another<br/>     02 building?<br/>     03 A. Yes.<br/>     04 Q. Did you walk there or drive?<br/>     05 A. Drive.<br/>     06 Q. Okay. And she showed you around the<br/>     07 mail room?</p> |

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|    |                 | <p>08 A. Yes.</p> <p>09 Q. Okay. What else did she do as part of</p> <p>10 your training?</p> <p>11 A. She just showed me -- she showed me</p> <p>12 where we would -- one of the buildings we would</p> <p>13 take mail to. That's it.</p> <p>14 Q. And how long did that take?</p> <p>15 A. I probably was with her maybe 30 to 45</p> <p>16 minutes.</p> <p>17 Q. What happened at the end of that 30 to</p> <p>18 45 minutes?</p> <p>19 A. Maurice came and said Gloria wanted to</p> <p>20 see me.</p> <p>21 Q. And by Maurice, you're talking about</p> <p>22 Maurice Chambliss; right?</p> <p>23 A. Yes.</p>   |
| 43 | 140:16 - 141:12 | <p>140:16 Q. Okay. All right. So all right. So</p> <p>17 we're walking through what happened your first</p> <p>18 day. And while you were out there waiting for</p> <p>19 the trainer to come, Cassandra Williams said</p> <p>20 something to you about your hair?</p> <p>21 A. I let Gloria Robinson and Maurice</p> <p>22 Chambliss know that I was pregnant. Maurice --</p> <p>23 I mean, Gloria Robinson came back into this</p> <p>24 shared office with Cassandra Williams.</p> <p>25 Cassandra Williams came out there and she looked</p> <p>141:01 at me and she said, "What's wrong with your</p> <p>02 hair?" And she said, "Why is it like that?"</p> <p>03 And I said, "You know, the Dynamic</p> <p>04 policy says, you know, as long as it's neat."</p> <p>05 She said, "I don't care what their</p> <p>06 policy says. They can send you somewhere else."</p> <p>07 And then she came back into this office, and</p> <p>08 then my trainer came and got me.</p> <p>09 Q. Okay. So this all happened before the</p> <p>10 trainer came and got you and y'all went around</p> <p>11 to the mail room and the building?</p> <p>12 A. Yes.</p> |
| 44 | 141:25 - 143:04 | <p>141:25 Q. Okay. So staying with what happened on</p> <p>142:01 July the 31st. So you come to work. You've</p> <p>02 gotten your picture made. You were waiting out</p> <p>03 there for your trainer; right?</p>  |

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|    |                 | <p>04           A.     Uh-huh.</p> <p>05           Q.     <b>While you were waiting for your trainer</b></p> <p>06     <b>is when you told Gloria Robinson and Maurice</b></p> <p>07     <b>that you were pregnant; right?</b></p> <p>08           A.     Yes.</p> <p>09           Q.     <b>Is there a reason why you told them</b></p> <p>10     <b>that you were pregnant but didn't tell them at</b></p> <p>11     <b>the interview?</b></p> <p>12           A.     No, it's not a specific reason.</p> <p>13           Q.     All right. Did Gloria Robinson say</p> <p>14     anything to you that you thought was hostile on</p> <p>15     the 31st after you told her that you were</p> <p>16     pregnant?</p> <p>17           A.     She -- she made a face and made a sound</p> <p>18     like (INDICATING) and then she came in the</p> <p>19     office. And then when she walked back out, she</p> <p>20     was just -- she seemed very agitated and she</p> <p>21     went outside and smoked a cigarette. And then</p> <p>22     she came back in, looked at me, and went back</p> <p>23     into her shared office with Cassandra Williams.</p> <p>24           Q.     And that's when Cassandra Williams came</p> <p>25     out and made her comment to you about, "What's</p> <p>143:01     <b>wrong with your hair?"</b></p> <p>02           A.     Cassandra Williams came out the first</p> <p>03     time Gloria Robinson went in the office. But,</p> <p>04     yes.</p> |
| 45 | 144:04 - 146:04 | <p>144:04       Q.     <b>All right. So the trainer comes and</b></p> <p>05     <b>gets you. You and the trainer go and do what</b></p> <p>06     <b>you were telling us about. And then someone</b></p> <p>07     <b>tells you you need to go to Gloria Robinson's</b></p> <p>08     <b>office; right?</b></p> <p>09           A.     Maurice came to the mail room.</p> <p>10           Q.     Okay. All right. How long had you</p> <p>11     <b>been at work at that point?</b></p> <p>12           A.     Maybe an hour. I don't know. Maybe an</p> <p>13     hour.</p> <p>14           Q.     All right. Tell us about the</p> <p>15     <b>conversation. So I assume you went straight to</b></p> <p>16     <b>Gloria Robinson's office?</b></p> <p>17           A.     Yes. He brought me to the shared</p> <p>18     office with her and Cassandra Williams.</p> <p>19           Q.     Did y'all ride -- did you go by car?</p>   |

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|    |                 | <p>20 A. Yes.</p> <p>21 Q. Did you and Mr. Chambliss have any</p> <p>22 conversation while you were in the car?</p> <p>23 A. I just asked him, you know, what did</p> <p>24 she need me for, and he told me he did not know.</p> <p>25 Q. That's all that you and Mr. Chambliss</p> <p>145:01 had talked about in the car ride?</p> <p>02 A. Yes.</p> <p>03 Q. Okay. All right. Tell me about the</p> <p>04 conversation you had with Gloria Robinson.</p> <p>05 A. So he brings me here. So she asked</p> <p>06 about, you know, my hair. And I was -- you</p> <p>07 know, I told her, I said, "Well, you know, I</p> <p>08 looked in Dynamic's handbook and it says that,</p> <p>09 you know, you just have to have it neat and it</p> <p>10 has to be groomed."</p> <p>11 And then she said, "Well, that's not</p> <p>12 how -- like you can't have it like this."</p> <p>13 And I said -- she said, "You can't have</p> <p>14 it like this at Hyundai."</p> <p>15 I said, "Well, can I see the policy?"</p> <p>16 And I was directing my questions --</p> <p>17 because Cassandra Williams was saying no, and I</p> <p>18 said, "Well, may I see the policy?"</p> <p>19 And then Cassandra Williams said, "I</p> <p>20 don't have to show you anything."</p> <p>21 And Gloria Robinson said, "How dare you</p> <p>22 ask my supervisor that question?"</p> <p>23 And I said, "Well, by law, you have to</p> <p>24 show me the policy."</p> <p>25 And she said, "I don't have to show you</p> <p>146:01 anything."</p> <p>02 And then it was silent. And then</p> <p>03 finally they showed me on the -- her computer,</p> <p>04 the document pulled up on her computer.</p> |
| 46 | 147:20 - 148:06 | <p>147:20 Q. So did you leave that meeting</p> <p>21 understanding that your hair was not supposed to</p> <p>22 be in dreadlocks?</p> <p>23 A. They told me in that meeting that I --</p> <p>24 that the only way that I could wear my hair like</p> <p>25 this is I wore a hat and my whole head was</p> <p>148:01 covered.</p>  |

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|    |                 | <p>02 Q. And who told you that?</p> <p>03 A. Cassandra Williams.</p> <p>04 Q. Otherwise, unless you were able to wear</p> <p>05 a hat and cover your whole head, you understood</p> <p>06 that you could not have the dreadlocks; right?</p>  |
| 47 | 150:05 - 151:01 | <p>150:05 Q. And how did that conversation end?</p> <p>06 A. I said -- Gloria Robinson asked me did</p> <p>07 I have a hat. I said, "I do have a hat."</p> <p>08 And she said, "Well, where is it?"</p> <p>09 I said, "It's at my house. I can go</p> <p>10 get it."</p> <p>11 And she said, "Well, how far do you</p> <p>12 stay?"</p> <p>13 I said, "It's about 30 minutes."</p> <p>14 She said -- she didn't say anything.</p> <p>15 And they were just standing there.</p> <p>16 And I asked Cassandra Williams, "What</p> <p>17 do you want me to do?"</p> <p>18 And she said, "I'm not telling you to</p> <p>19 do anything."</p> <p>20 And then I said, "Well, you know, I</p> <p>21 would like to just go back with my trainer."</p> <p>22 She said, "No."</p> <p>23 I said, "Well, what do you want me to</p> <p>24 do?"</p> <p>25 And Gloria Robinson said, "Just go</p> <p>151:01 home."</p> |
| 48 | 151:25 - 154:06 | <p>151:25 Q. All right. So let's -- the next day,</p> <p>152:01 August 1 -- which I understand was the last day</p> <p>02 you worked at the Hyundai facility.</p> <p>03 A. Yes.</p> <p>04 Q. Correct? What time did you show up at</p> <p>05 work that day?</p> <p>06 A. Around the same time. Around between</p> <p>07 7:00 and 7:30. I don't know the exact time.</p> <p>08 Q. Did you clock in on that day?</p> <p>09 A. I don't remember clocking in, no.</p> <p>10 Q. So you didn't clock in for either day?</p> <p>11 A. I don't remember clocking in, no.</p> <p>12 Q. Okay. What happened first? What did</p> <p>13 you do first?</p> <p>14 A. I just sat in the same chair that I sat</p>  |

15 in the day before and just waited for my  
16 trainer.  
17 Q. And how long did you wait for?  
18 A. Maybe 20, 30 minutes.  
19 Q. Do you know, at some point did your  
20 trainer tell Gloria Robinson or someone else  
21 that you had some complaints about what had  
22 happened to you at the facility with the  
23 Hyundai --  
24 A. My trainer told Gloria Robinson that I  
25 felt like that they were being unfair to me.  
153:01 Q. And when did that happen? Was that the  
02 day before on the 31st?  
03 A. On August 1st.  
04 Q. Oh, this was on August 1st?  
05 All right. So you wait about 30  
06 minutes and your trainer shows up; right?  
07 A. Yes.  
08 Q. All right. And where did you and the  
09 trainer go?  
10 A. To the mail room.  
11 Q. And are you still being trained at this  
12 point?  
13 A. Yes. We're in the -- yeah, she was  
14 just showing me some things in the mail room.  
15 Q. And was it during this time that you  
16 told your trainer that you thought you were  
17 being treated unfairly?  
18 A. She asked me on the ride to the mail  
19 room why did I go home.  
20 Q. And what did you tell her?  
21 A. That they said it was something wrong  
22 with my hair.  
23 Q. All right. And you told the trainer  
24 that you thought you were being treated unfairly  
25 because of your hair?  
154:01 A. Yes, I told her I didn't think it was  
02 fair, yes.  
03 Q. And what is it that you thought was  
04 unfair about it?  
05 A. That I couldn't be here because of my  
06 hair.

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| 49 | 159:11 - 160:20 | <p>159:11 Q. And what had you done about your hair<br/>     12 on August 1?</p> <p>13 A. I wore a hat and I -- that completely<br/>     14 covered my head.</p> <p>15 Q. Do you have a picture -- do you happen<br/>     16 to have a picture of --</p> <p>17 A. Of --</p> <p>18 Q. -- of the hat that day with you --</p> <p>19 A. No.</p> <p>20 Q. -- wearing it? Do you still have the<br/>     21 hat?</p> <p>22 A. I do.</p> <p>23 Q. If you'd hold on to it.</p> <p>24 All right. Anything else you can<br/>     25 recall her saying during that conversation?</p> <p>160:01 A. I asked her -- I -- you know, I said,<br/>     02 "Well, I wore a hat, you know, as you guys said<br/>     03 I should," and she said, "This is not about<br/>     04 that."</p> <p>05 And she said, "Are you going to be this<br/>     06 way until" -- and she pointed to my stomach.</p> <p>07 And then I -- she said -- like she<br/>     08 started inching forward towards me. She was<br/>     09 sitting in the chair I'm currently sitting in,<br/>     10 and I was sitting in the chair where the court<br/>     11 reporter's sitting in --</p> <p>12 Q. Y'all were in this room?</p> <p>13 A. Yes.</p> <p>14 Q. Okay.</p> <p>15 A. And she said, "Have you been<br/>     16 discriminated against," in like a loud, hostile<br/>     17 voice. And I said, "I wore a hat, you know, as<br/>     18 you guys asked me to."</p> <p>19 She said, "This is not about that.<br/>     20 This is going to be a problem."</p> |
| 50 | 162:04 - 162:12 | <p>162:04 A. No. She dismissed me, and Maurice took<br/>     05 me back to the mail room.</p> <p>06 Q. Okay. So you're back in the mail room.</p> <p>07 Was Ms. Howell --</p> <p>08 A. Yes.</p> <p>09 Q. -- still there?</p> <p>10 A. Yes.</p>   |

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|    |                 | 11           Q.    So did you resume your training?<br>12           A.    Yes.   |
| 51 | 164:17 - 164:23 | 164:17       A.    Well, Mr. Chambliss came into the mail<br>18     room.<br>19           Q.    Okay. Do you know why he was there?<br>20           A.    No.<br>21           Q.    Okay. And what did you say to him?<br>22           A.    That I would like to speak with someone<br>23     in human resources.   |
| 52 | 165:08 - 165:20 | 165:08       Q.    Okay. Who did you talk to?<br>09           A.    Ray Cureton.<br>10           Q.    How did you know Mr. Cureton's name?<br>11     How did you know to speak to Mr. Cureton?<br>12           A.    Because that's who Gloria Robinson told<br>13     Maurice Chambliss to have -- for me to go speak<br>14     to.<br>15           Q.    And was this on the 1st?<br>16           A.    Yes.<br>17           Q.    Where in this timeline of events does<br>18     Gloria Robinson tell Mr. Chambliss that you need<br>19     to speak to Ray Cureton?<br>20           A.    He called her. |
| 53 | 166:14 - 166:17 | 166:14       Q.    And what were you told?<br>15           A.    You can go to -- he gave me the address<br>16     for the Dynamic Security office. He didn't say<br>17     what his title was or anything like that.  |
| 54 | 167:08 - 167:13 | 167:08       Q.    All right. So Mr. Chambliss gives you<br>09     Ray Cureton's address; right?<br>10           A.    Yes.<br>11           Q.    To the Dynamic Security office in<br>12     Montgomery?<br>13           A.    Yes.   |
| 55 | 168:11 - 168:24 | 168:11       Q.    All right. Tell me about the<br>12     conversation you had with Mr. Cureton.<br>13           A.    I got there, and first thing he asked<br>14     me was, "Are you going to sue us?"<br>15           Q.    And what did you tell him?<br>16           A.    I said, "I want to talk to somebody in<br>17     human resources."<br>18           Q.    Okay. What happened? Tell me what<br>19     y'all talked about.  |

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|    |                 | <p>20 A. I just told him what happened.</p> <p>21 Q. Tell me as best you can recall what you</p> <p>22 told him.</p> <p>23 A. The events that transpired on the 31st</p> <p>24 of July and August 1st.</p>   |
| 56 | 174:11 - 174:22 | <p>174:11 Q. And so you were going to return to the</p> <p>12 office -- return to the Hyundai facility?</p> <p>13 A. No, he told me that -- he asked for my</p> <p>14 badge and he said that, you know, "They don't</p> <p>15 want you out there." And I said, okay, and I,</p> <p>16 you know, gave him my badge.</p> <p>17 Q. And we may have talked about this</p> <p>18 before. Did he ever say anything more about who</p> <p>19 didn't want you out there?</p> <p>20 A. He said Gloria Robinson didn't want me</p> <p>21 out there. And when I asked him why, he said</p> <p>22 because of my hair and something else.</p>   |
| 57 | 184:11 - 185:03 | <p>184:11 Q. Did someone call and tell you that you</p> <p>12 needed to -- why you needed to do Defendants'</p> <p>13 Exhibit 15 in addition to Exhibit 14?</p> <p>14 A. The investigator who was assigned to me</p> <p>15 just said that I needed -- that she had some</p> <p>16 documents that she needed me to sign.</p> <p>17 Q. Okay. And that was one of them?</p> <p>18 A. Yes.</p> <p>19 Q. Do you know what the other documents</p> <p>20 were that she gave you to sign?</p> <p>21 A. This one right here.</p> <p>22 Q. Okay. But anything besides that? You</p> <p>23 said documents plural, which is what I was</p> <p>24 wondering.</p> <p>25 A. I apologize. Document.</p> <p>185:01 Q. You did not fill out another intake</p> <p>02 questionnaire, did you?</p> <p>03 A. No.</p> |
| 58 | 226:16 - 227:06 | <p>226:16 Q. When Ray Cureton told you they did not</p> <p>17 want you at the facility anymore, did he</p> <p>18 specifically mention Gloria Robinson by name?</p> <p>19 A. That's who the -- when we were talking</p> <p>20 and I was talking with him, that's who the</p> <p>21 conversation was about. He was saying like,</p> <p>22 "Oh, I've known her," and, "She's not like</p>   |

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|    |                 | <p>23 that," and, you know, "They don't want you<br/>     24 there."</p> <p>25 And he said like -- and I was like,<br/>     227:01 "Who?" And he said, "Gloria Robinson." And<br/>     02 then I asked him, "Why?" He said, "Because of<br/>     03 your hair and something else."</p> <p>04 Q. That's the only name he mentioned?</p> <p>05 A. I don't remember exactly. I know he<br/>     06 mentioned her name.</p> |
| 59 | 243:07 - 243:09 | <p>243:07 Q. When did you first start wearing your<br/>     08 hair in dreadlock style?</p> <p>09 A. When I was 18.</p>   |
| 60 | 270:21 - 271:03 | <p>270:21 Q. You can answer. Did you ever see any<br/>     22 males wearing dreadlocks at the facility?</p> <p>23 A. No.</p> <p>24 Q. Did you ever see any white people<br/>     25 wearing dreadlocks at the facility?</p> <p>271:01 A. I did not see any males or any white<br/>     02 people. That does not mean that they did not<br/>     03 have them.</p>   |
| 61 | 277:21 - 277:25 | <p>277:21 Q. When did you first learn you were<br/>     22 pregnant?</p> <p>23 A. In May of 2017.</p> <p>24 Q. May of 2017?</p> <p>25 A. Yes.</p>   |